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August 18, 2022

Via ECF and Email Hon. Paul E. Davison United States Magistrate Judge Southern District of New York 300 Quarropas Street White Plains, NY 10601

USA v. Rafael Grullon 22 MJ 6662 Re:

REQUEST TO MODIFY BAIL CONDITIONS

Your Honor:

I am assigned counsel to Grullon. On August 12, 2022, the Court released Grullon on an Appearance Bond subject to Conditions of Release, including restricting Grullon's travel to SDNY and EDNY. See Additional Conditions of Release ¶7f. Grullon's sister Karina Grullon lives in New Jersey. Grullon seeks modification of his conditions of release to permit visits with his sister at her residence in New Jersey. Accordingly, my client requests that the District of New Jersey be added to ¶7f to permit visits with his sister.

Karina Grullon's New Jersey address has been provided to AUSA Kevin Sullivan and U.S. Pre-Trial Services Officer Shannon Finneran. I have conferred with the Government and Pre-Trial Services and there is **no objection** to this application.

Respectfully submitted,

Daniel A. Hochheiser

Cc:

Shannon Finneran@nyspt.uscourts.gov Kevin.sullivan@usdoj.gov

APPLICATION GRANTED

Hon. Judith C. McCarthy 8-19-2022